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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

<p>George DC Parker II, and Lori A Parker</p> <p style="text-align: center;">,</p> <p style="text-align: center;">Plaintiff(s),</p> <p style="text-align: center;">v.</p> <p>THE SOCIETY FOR CREATIVE : ANACHRONISM, INC., a/k/a/ "SCA" : or "SCA, Inc.", et.al,</p> <p style="text-align: center;">Defendant(s).</p>	<p>CASE NO. _____ [to be filled in by Clerk's Office]</p> <p>COMPLAINT FOR A CIVIL CASE</p> <p>Jury Trial: X Yes   <input type="checkbox"/> No</p>
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**I. THE PARTIES TO THIS COMPLAINT**

A. Plaintiff(s)

Name	George DC Parker II
Street Address	10710 199th St E
City and County	Graham, Pierce
State and Zip Code	Washington, 98338
Telephone Number	253-302-0014
Name	Lori A Parker
Street Address	10710 199th St E
City and County	Graham, Pierce

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State and Zip Code	Washington, 98338
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Telephone Number	253-302-0015
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B. Defendant(s)

Defendant No. 1

Name	Society for Creative Anachronism, Inc
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Job or Title ( <i>if known</i> )	
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Street Address	P.O. Box 611928
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City and County	San Jose, San Jose
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State and Zip Code	California, 95161
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Telephone Number	1-800-789-7486, (480) 263-9305
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## Basis for Jurisdiction

What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal question ☒ Diversity of citizenship

## C. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The plaintiff is George DC Parker II, is a citizen of the State of Washington, county of Pierce.
2. The plaintiff is Lori A Parker, is a citizen of the State of Washington, county of Pierce.
3. The defendant, The Society for Creative Anachronism, Inc, (hereinafter referred to as the "SCA", "SCA, Inc."), is incorporated under the laws of the State of California, and has its principal place of business in the State of California. The Society for Creative Anachronism is a foreign corporation or other organized business entity which, upon information and belief, maintains multiple offices in the State of Washington and which maintains its worldwide headquarters and/or principal place of business in San Jose, California, having a mailing address located at P.O. Box 611928, San Jose, CA 95161, 95036-0789.
4. The Amount in Controversy.

This action is brought by Plaintiffs to the United States District Court for the Washington State pursuant to 28 U.S.C. Section 1332 (a)(1) in that the amount in controversy exceeds the amount and/or value of \$75,000.00 exclusive of the interest and costs and the action currently is between citizens of different states.

5. Defendant the Society for Creative Anachronism regularly conducts business within the State of Washington and is a legal alien entity.

6. Among numerous other business activities, the SCA operates in Washington State known as part of the Kingdom of An Tir (An Tir) which has served and serves its numerous

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1 members in and around Washington since 1968 and otherwise services the greater Pacific  
2 Northwest, its members and participants.

3 7. At the time of filing, venue is appropriate in this judicial district pursuant to 28 U.S.C.  
4 section 1391(a)(2) in that a substantial part of the events giving rise to the claim occurred in this  
5 judicial district.

6 8. The Society for Creative Anachronism, Inc. (hereafter "SCA"), represents that it is an  
7 international "non-profit volunteer educational organization. The SCA is devoted to the research  
8 and re-creation of pre-seventeenth century skills, arts, combat, culture, and employing knowledge  
9 of history to enrich the lives of participants through events, demonstrations, and other educational  
10 presentations and activities."

11 9. The SCA has further represented that it "is divided into twenty regions called  
12 kingdoms. Each kingdom is ruled by a pair of monarchs who have competed in a Crown  
13 Tournament to win the throne. Kingdoms contain local chapters known as Cantons, Shires, and  
14 Baronies. The members of these local chapters are the ones who actually plan and run all the  
15 events, practices, and other activities for SCA participants."

16 10. The SCA has over 30,000 members residing in countries around the world.

17 11. The SCA was founded May 1, 1966 in Berkeley, California by a small group of  
18 people.

19 12. While a person can become a formal member of the SCA, membership is not required  
20 to participate in SCA activities or events. Administrative functions, including management of  
21 memberships throughout the SCA is performed by SCA employees and/or volunteers at its San  
Jose, California headquarters.

13 13. The SCA is run by the Board of Directors who have ultimate authority concerning the  
14 interpretation of the SCA's by-laws, rules and policies. The Board of Directors can dissolve any  
15 subgroup within the SCA and sanction and expel members.

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1           14. The head administrative agent of the SCA is the Society Seneschal. “The Society  
2           Seneschal is responsible for coordinating the administration of the Society’s historical recreation.  
3           This involves directing the activities of the Kingdom Seneschals and of Society-level deputies.  
4           Where questions arise concerning the intent of the [Society's laws and policies], the Board  
5           specifically authorizes the Society Seneschal to make interpretations and clarifications...the  
6           Society Seneschal is also responsible for reviewing all sanction related activities.”

7           15. The seneschal of a kingdom “is the chief administrative officer” of the Society for the  
8           kingdom, which includes coordinating the other kingdom officers as required for the smooth  
9           operation of the kingdom and for its relations with outside agencies. The kingdom seneschal is  
10          the legal representative of the corporation for the group. Duties include management of kingdom  
11          volunteers, day to day operations management as well as investigating disputes among members  
12          and handing down sanctions as appropriate. The seneschal of a Barony (local chapter) “is the  
13          chief administrative officer” of the Barony within the kingdom, and is also the legal  
14          representative for the local group. Duties can include day to day operations for the local group,  
15          signing local contracts for sites or services and coordinating the other kingdom and baronial  
16          officers as required for the smooth operation of the barony and for its relations with outside  
17          agencies.

18          16. There is a body of participants known as the “Peerage”. Prospective peers are  
19          nominated by other peers and awarded solely by the crown. Persons obtaining peerage are  
20          regarded as the penultimate in Honor, Grace, Chivalry and the other Noble Virtues espoused by  
21          the SCA and as seen in their Code of Conduct. Additionally, peers are held up as the highest of  
22          authority and are expected to be examples to aspire to and are supposed to act in accordance with  
23          the chivalric virtues of honor and service in all interactions with SCA members and participants.  
24          peers are local leaders of groups, take students to train to become peers and are generally  
25          accepted as the highest example of behavior expected in the SCA.

18. The crown of a kingdom is chosen by combat (Crown Tourney), and is almost exclusively a member of the peerage. There are no specific requirements for becoming the Crown, except that the contender wins the tournament. The Crown is held for a six-month period. The Crown gives awards based on recommendations from members, and holds medieval-style courts to present the atmosphere of the Middle Ages. Crowns can hand down sanctions, bestow peerages, accept officer- volunteers as well as create and amend the laws of their kingdom as they deem necessary. They can appoint officers of the kingdom and hold courts to administer the kingdom.

## II.STATEMENT OF CLAIM

19. Plaintiffs George Parker (George) and Lori (Lori) Parker were /are members of the SCA and were active in a subchapter of the SCA and the Kingdom of An Tir, Barony of Blatha an Oir (Tacoma, Pierce County, Washington) from 2006 until 2021. Plaintiffs participated fully, remaining as paid members for over 30 years, beginning in Arizona and continuing after they moved to Washington State. Plaintiffs volunteered for positions, held offices, participated at events, been a vendor at events and generally contributed to the atmosphere and learning environment of the SCA. Plaintiffs were given numerous awards for artistry and service from 2 kingdoms (both Arizona and Washington), including many from An Tir. Plaintiffs managed a popular sales/vendor booth during their time in the Washington kingdom of An Tir, traveling extensively throughout Washington, Oregon, California and Arizona vending heavily at predominantly SCA events and others.

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1           20. In 2016, Lori volunteered for a position in the kingdom known as the Kingdom  
2 Youth and Family Achievement (“YAFA”) Officer under the then Kingdom Seneschal Julia  
3 Sempronia (legal name unknown). In January 2017, Julia was replaced by Lenora Truble (legal  
4 name Tami Hayes). Shortly after, Lori began experiencing issues with another Kingdom officer  
5 regarding background checks. The SCA required the words “YAFA Mentor “to be placed on  
6 background checks, and Lenora Truble and her associate Angharad Albanes (legal name  
7 unknown) pushed back, refusing to implement the change. Lenora Truble adamantly refused to  
8 adjust the wording on the documents.

9           21. On Saturday, September 2nd, 2017, Lori did try to engage Lenora Truble in a face to  
10 face conversation regarding the issue at the Crown Tourney event in Canada, but Lenora was too  
11 busy to attend the meeting she (Ms.Truble) requested. On September 21, 2017 Ms. Truble sent an  
12 email regarding “complaints” on the length of time Background checks were taking. Lori asked if  
13 the instructions for YAFA Mentors had been added to the Kingdom instructions. Conversations  
14 by Ms. Truble in subsequent emails were dismissive and failed to address Lori’s concerns. On  
15 September 21, Lori emailed her Society Officer Supervisor with concerns regarding the issues she  
16 was having with Ms. Truble. On September 23, 2017, the supervisor (David Keen, now deceased)  
17 then contacted A.J Pongratz, then Vice President of Operations/Society Seneschal. Mr. Pongratz  
18 then contacted Lenora Truble, with CC’s to the corporate office, the corporate treasurer, Lori, and  
19 Davis Keen regarding the Background check issue. On September 27, 2017, Ms. Truble sent an  
20 email with the “new” instructions for background checks.

21           22. On or about October 18th of 2017, the An Tir Social Media Officer Isabella (legal  
name Mary LaRose) was added to the An Tir YAFA Facebook Page, run by Lori Parker for the  
families involved in the YAFA program. The page was set to “private” because the page  
contained identifiable information regarding under-age youth participating in the program. She  
immediately added the Kingdom Seneschal, Lenora Truble to the page. Shortly after, Plaintiff  
Lori Parker received a private message from Mary Larose asking her to change the privacy to

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1 “Public”. Lori objected, stating the page contained information and pictures of the children. She  
2 also stated that according to the Social Media Policy, the page did NOT follow the guidelines set  
3 for making the page public. Conversations went back and forth for 2-3 days. On October 20th,  
4 Lenora Truble referenced Lori’s personal Facebook page, copying into the email itself some of  
5 the content of Lori’s post. Ms. Truble was NOT a friend on Facebook or other Social Media, and  
6 therefore her referencing Lori’s personal page was uncomfortable and resembled stalking. Too, it  
7 was Lori’s personal page, and as such, did not fall under the SCA Social Media Policy. On  
8 October 22, 2017, Ms. Truble sent an email releasing Lori from her Kingdom position, citing “  
9 you refused to make those changes, you have taken yourself off of the admin entirely for the  
10 YAFA page (something you were not asked to do), and you blocked both myself and Isabella  
11 from your Facebook profile, meaning that neither of us can see your posts to the YAFA page or  
12 any other group page.” As a note: being on Facebook was never a requirement for participation in  
13 the SCA, nor is it a requirement for holding an SCA office. She continued saying “Deliberately  
14 refusing a direct and reasonable request from me and then blocking me from seeing public  
15 FaceBook posts you make, on any group page, makes for an untenable working relationship. This  
16 latest incident adds to a growing list of issues you have had with both myself, with other officers  
17 and with event staff.” The email culminated in the statement that Lori was removed from her  
18 office. In September 2017, Lori had taken on the position of Deputy to the Society YAFA officer,  
19 and later in August 2018, after being let go from the Kingdom office, Lori became Society Youth  
20 and Family Achievement Officer.

21 23. After Lori’s removal from the Kingdom position, both Lori and George began to  
experience issues within their home group of Blatha An Oir (BAO). Beth Park, Jonnalyhn  
Wolfcat Prill, Francisca Ossiander, Dawn Chronister and Denise Coyle (all legal names, to the  
best of Plaintiff’s knowledge) were some of the primary attackers. Including online attacks from  
members of the Tacoma, Seattle, Olympia and other groups and of the local Peerage.



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1           24. In late 2018 the position of Baronial Arts and Sciences office opened in the Tacoma  
2 branch of Blatha An Oir, hereafter referred to as BAO. George stepped up to volunteer, and was  
3 told he would need the paperwork filed by the then Baron Gernon (legal name unknown). George  
4 was informed that the new Arts officer would be Jonnaylyn (known as Jonnalyhn Wolfcat Prill,  
5 legal name uncertain). This is important due to the circumstances that followed. On January 1st,  
6 2019, George tried to add a class to a Thursday Social, and was verbally attacked on Facebook by  
7 Beth Park, Jonnalyhn Wolfcat Prill, Francisca Ossiander, Dawn Chronister and Denise Coyle as  
8 well as other officers and members in the Barony. Lori was also attacked online in the same  
9 conversation, and on private messaging by Beth Park, Jonnalyhn Wolfcat Prill and Francisca  
10 Ossiander.

11           25. On November 20th of 2018, George and Lori sent in their letter of intent to become  
12 Baron and Baroness of the BAO group. The SCA has no set rules or guidelines pertaining to  
13 volunteers wishing to serve as Baron and Baroness, or indeed, any office up to and including  
14 financial and legal representatives. Once the letter was made public, George began to experience  
15 many cases of harassment and bullying from various officers and general members of the SCA.  
16 He was contacted via Facebook messenger and called a Nazi and other names.

17           26. The harassment and bullying became public during the Crown Tourney event in May,  
18 when George and Lori were asked to meet with a Peer, Raphealla Di Contino (legal name  
19 unknown). Plaintiffs had put out on social Media that they would be available to meet with  
20 Baronial members to answer any questions they may have regarding Plaintiffs volunteering for  
21 the office/roles of Baron and Baroness. Raphealla Di Contino (legal name unknown) asked to be  
met with at a location run by Patrick Fletcher, stating it was a “neutral” location. Accompanying  
Plaintiffs were LaToya Johnson and 2 others. The suggested location was public, with many  
bystanders around who heard every word spoken by Ms. Di Contino, as she made no effort to  
control the tone or loudness of her voice. Unbeknown to Plaintiffs at that time, Patrick Fletcher  
was one of a group of people who had been slandering George online and in private messages.

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1 Ms. Di Contino proceeded to fling abusive language at both George and Lori, in the presence of  
2 witnesses. She called George a Nazi, and Lori abusive. She reiterated those comments over and  
3 over, embellishing and adding to the statements, and was heard by at least 4 bystanders known to  
4 Plaintiffs, as well as 3 personal witnesses Plaintiff themselves brought to the meeting. Following  
5 this incident, harassment by the general SCA members increased for both Lori and George, and  
6 became very public, with incidents appearing on the Social Media pages of the local Barony, as  
7 well as other social media pages ostensibly managed by the SCA.

7 27. On July 3rd, 2019 George and Lori sent an email to the Kingdom Seneschal Alianora  
8 Greymoor, (Kirsten Chow) regarding the incident with Ms. Di Contino. On July 8th, the Kingdom  
9 Seneschal responded, referring the Plaintiffs back to the local Seneschal Beth Park. On July 8th,  
10 the plaintiffs emailed the complaint to Beth Park. On July 17, the Plaintiffs emailed Beth Park  
11 again, having received no response to their original email. Later, Plaintiffs were informed that  
12 Ms. Di Contino, Beth Park and Jonnalyhn Wolfcat Prill were great personal friends.

12 28. On July 31st, Plaintiffs contacted Mike Watkins, then Vice President of Operations/  
13 Society Seneschal, regarding concerns they had about the recent polling for Baron and Baroness  
14 in Blatha An Oir. Plaintiffs' questioned Mike Watkins regarding the "votes" by populous  
15 members and how members could choose any number of candidates, how plaintiffs were told that  
16 the ballots cast had been "burned" and were unavailable for recount or verification purposes.

16 29. On September 4th, Lori had a conversation with Beth Park via Facebook messenger  
17 asking when they could formalize plaintiffs' complaint against Rafaella di Contino. On September  
18 10th, in compliance with Corporate Policy on disputes, plaintiffs met with the Baronial Senechal  
19 Beth Park, Francisca Osslander and Elizabeth Lewis. On October 20th, plaintiffs requested the  
20 transcript of the meeting, per Corporate Policy. On October 25-27, all parties were in attendance  
21 at an event, and plaintiffs still did not receive the requested transcript. On October 28th, the  
22 transcripts were yet again requested via email, with the Kingdom Seneschal CC'd, without  
23 response.

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1           30. On October 28, 2019 Plaintiffs submitted a statement that had been requested from  
2           the kingdom seneschal, Ms. Chow, which included the requested sanctions against the parties  
3           involved in the complaint to Ms. Chow- then seneschal for An Tir. On Nov. 7th, Ms. Chow  
4           acknowledged receipt of the complaint. On Nov. 11th, Ms. Chow assigned Attia Prima (legal  
5           name unknown) to investigate the incident. On November 25th, Lori emailed the investigator that  
6           the harassment was continuing, providing a multitude of documents and screenshots. In  
7           December 2019, Plaintiffs were informed that the investigation had been completed, and a  
8           disposition would be given mid-January. Plaintiffs knew that several of their named witnesses had  
9           NOT been interviewed by the investigator Attia Prima. Plaintiffs then emailed the Society Vice  
10          President/Seneschal, Mike Watkins about the failure to follow procedure.

11          31. On February 26th, 2020, the then King and Queen of An Tir, Emerson Waite and  
12          Helen Holmes, informed plaintiffs via email of the results of the investigation via Ms. Chow. The  
13          result was prohibiting all parties from posting to official Social Media for 6 months. On March  
14          3rd, the plaintiffs were provided with a summary of complaints against THEM, and were never  
15          provided copies of their own complaint as required by Corporate Policy, which they had asked for  
16          a multitude of times.

17          32. On March 15, 2020, Plaintiff George reached out to the then SCA president John  
18          Fulton, as well as the Corporate Vice-President for Operations / Society Seneschal Mike Watkins  
19          regarding the bullying and harassment he was receiving and the complaint he sent Mike Watkins  
20          regarding such. Included were questions regarding the process, and details of how the so-called  
21          investigation had been conducted. On April 8th, 2020, Lori emailed the Vice-President for  
Operations / Society Seneschal with 3 documents, outlining her complaint with the kingdom of  
An Tir crowns, Emerson Waite and Helen Holmes. as well as the investigative process and the  
harassment she was receiving online. On April 27th, 2020, Mike Watkins replied stating he would  
contact Ms. Chow regarding the lack of interviews.

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1           33. Over the next several months, no additional moves were made regarding the  
2 complaint. The complaint and the appeal of the original decision handed down by Emerson Waite  
3 and Heather Holmes via Ms. Chow was allowed to stand without penalty. Plaintiffs continued to  
4 be bullied online via messenger and Facebook. Once the 6 month hiatus was over, SCA members  
5 again used Facebook to harass and attack Plaintiffs. In Nov. of 2020 Lori emailed asking what  
6 happened with her filed complaint and received no answer. To date, there has been no response.

7           34. On April 1 of 2021, Plaintiff George Parker was engaged in a conversation on  
8 Facebook on a friend's page (LaToya Johnson). This was a persona page of an SCA member, but  
9 not an official page as outlined in the Society Media Policy. This page was the personal page of  
10 Ms. Johnson, who had since moved back to Louisiana, and was n longer part of the kingdom of  
11 An Tir. This page was not managed or owned by the SCA, nor was content therein managed or  
12 moderated by the Corporation or its officers,as per their own corporate policy. Plaintiff George  
13 Parker objected to a term used by the original poster, and was attempting a polite discourse on  
14 why he found that particular term offensive. He was ridiculed for his stance, harassed and baited  
15 by persons known to him, including a person who had been currently sitting as a Baron in  
16 Oregon, as well as other Peers personally known to him; Elizabeth Phipps (legal name unknown,  
17 a peer from Blatha an Oir), Skamp Widegrin (legal name unknown) who, in the thread, admitted  
18 to being the current baron of the Portland, Ore group, Michelle Height (legal name unknown),  
19 Angela Gallant, Stephanie McCloud, Rachel Somers and Joel Reid, Jr., (all assumed as legal  
20 names) until he lost patience and his temper and made an off-color remark that many objected to,  
21 but was allowed by Facebook standards. The remark was almost immediately removed, only to be  
subsequently reposted by Rachel Somers with the tag "dirty deletion". Many of the persons  
involved in that conversation, including the original poster (LaToya Johnson) are deeply involved  
with the SCA Diversity, Equity and Inclusion facebook groups, as well as local SCA sanctioned  
DEI committees, groups and offices. The repost remained for several months.

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1           35. On April 2nd of 2021, George was notified via email (and later certified mail) that he  
2 was exiled from the kingdom of An Tir- exile meaning he could not engage in any SCA activity  
3 in An Tir. He was further told his case would be sent to the Board for consideration of Removal,  
4 Revocation and Denial of Membership (hereinafter referred to as “R&D”), The announcement  
5 was publicly placed on official SCA Facebook venues (groups) and other social media venues,  
6 their official Kingdom website, kingdom newsletter as well as being re-posted onto private pages  
held by members and non-members.

7           36. Within hours, negative comments from Plaintiff's local groups showed up on the  
8 official Baronial Facebook pages. Not only was George mentioned, but Lori also, and the name of  
9 their vendor booth, attached to comments that they were abusive and racist. On April 7th 2021,  
10 Lori emailed the seneschal regarding the posts, as was “assured” that the content would be  
11 removed from official Facebook groups. Plaintiff responded that the removal wasn't good enough,  
and that she wished for more action. No adequate response was given.

12           37. Plaintiff wrote the SCA Board asking for an appeal of the exile. The Board consists of  
13 peers voted in by other Board Members. Plaintiff enumerated his disability, Asperger's and  
14 ADHD, including excerpts from the Autism Society and the DSM IV. Plaintiff also enumerated  
15 the failure of the local representatives of the corporation to follow corporate policy regarding  
16 investigation for exile, failure of the Diversity, Equity and Inclusion Officer to intercede, as  
17 outlined on the SCA webpage and in the Society DEI Handbook. Plaintiff included information  
regarding the bias on the part of the officer corps in An Tir, bias related to previous interactions  
and complaints regarding the actions of peers, the so-called epitome of SCA chivalric behavior.

18           38. On April 7, 2021, George sent an email to the then Society Vice-President /Seneschal  
19 Lis Schaer, regarding his exile from An Tir, clearly outlining what had happened (including  
20 screenshots), and including an explanation of Corporate policy that local officers had failed to  
21 follow, along with information regarding his disability. That email was ignored by the Corporate  
office, with a simple receipt response.

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1           39. In August of 2021, Plaintiff George Parker was notified of the pending investigation  
2 being instituted by the Board of Directors. He was told an investigator had been assigned, one  
3 Stacy Hall.

4           40. In late August, Plaintiff George Parker was notified once again, that the matter was  
5 “completed” BEFORE George had a chance to tell his side. Plaintiff George Parker was notified  
6 via email that the investigation was closed, as the investigator assigned, Stacy Hall, had attempted  
7 to contact Plaintiff George Parker on 3 separate occasions with no response. George immediately  
8 contacted Ms. Schaer, who claimed Stacy Hall had a mistake in the email address. There were no  
9 phone calls nor other attempts to contact Plaintiff, except via email, prior to his conversation with  
10 Ms. Schaer.

11           41. Subsequent emails regarding the so-called investigation made it clear the lack of  
12 training both Ms. Schaer and Ms. Hall had with dealing with persons with disabilities. Ms.  
13 Schaer even went so far as to call Plaintiff George Parker’s email tone “aggressively adversarial”  
14 in one email. The investigation process includes the criteria that those being investigated take part  
15 in a video call. Plaintiff George Parker declined the video call, due to his disability making it  
16 difficult for him. Plaintiff submitted his rebuttal to the complaint against him via email to Ms.  
17 Hall on September 17, 2021, after several intervening emails. Later Plaintiff found out his refusal  
18 to submit to a video conference counted against him in the investigative process, as per corporate  
19 documents. On October 23, 2021 at the quarterly meeting, held publicly via video conference,  
20 Plaintiff George Parker was formally given the Removal and Denial of Membership from the  
21 SCA. On October 27th, 2021, the Board issued an emergency removal of Emerson Waite, the  
king who initially exiled Plaintiff George Parker.

          42. On January 15, 2022, Plaintiff George Parker submitted his appeal to the office of the  
Vice President/Seneschal, Ms. Schraer, outlining the way the Society officers both local and  
Corporate, failed to follow corporate guidelines and procedures, and how the corporate officers  
failed to follow the corporate Social Media Policy. He outlined the bias of the officers in An Tir

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1 when it came to dealing with both Plaintiffs, Lori and George. On February 28th, Ms. Schraer  
2 supposedly submitted the appeal to the Board of Directors, who declined to hear the appeal.

3 43. On March 12, 2022, Plaintiff Lori Parker emailed the Vice president/Society  
4 seneschal Ms. Schraer and each Board member individually specifically citing the failure of both  
5 kingdom and Corporate officers in following Corporate policy, specifically Section VI A.4 and  
6 A.5 as well as Section VI C 1 of the Society Seneschal handbook. Corporate Policy (Corpora)  
7 Section F.1, and Section X.4 were not followed. In addition, Lori pointed out the Diversity,  
8 Equity and Inclusion webpage and Mission Statement had failed to be followed. This email was  
9 given a short response by Ms Schraer, and when pursued, Ms. Schraer stated she would no longer  
10 discuss the matter with Plaintiff Lori Parker. Board members did not respond.

11 44. On June 15, 2022, Plaintiff George Parker once again asked for an appeal of the  
12 R&D. The Board decided that his request did not include new information, and so the appeal was  
13 again denied.

#### 14 COUNT I – NEGLIGENCE

15 45. Plaintiff incorporates herein by reference all the above allegations contained in  
16 paragraphs 1 through 44 and throughout this entire complaint as though the same were fully set  
17 forth herein at length.

18 46. The defendant was negligent and/or reckless including but not limited to, inter alia,  
19 the following:

- 20 a. negligently fostering and condoning a hostile work environment;
- 21 b. negligently failing to protect Plaintiffs and other members from hostile environments at  
SCA related activities and/or events;
- c. negligently failing to protect Plaintiffs and other members from the retaliatory action  
from Peers and officers;
- d. negligently failing to adopt, enforce and/or follow adequate policies and

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1 procedures for the protection from harassment, defamation, slander and bullying at SCA related  
2 activities and/or events, of its members including plaintiffs and, in the alternative, failing to  
3 implement and comply with such procedures which had been adopted;

4 e. negligently failing to implement, enforce and/or follow adequate protective and  
5 supervisory measures for the protection of members from harassment, defamation,  
6 slander, bullying and false allegations;

7 f. negligently failing to adopt, enforce and/or follow policies and procedures  
8 to protect its members;

9 h. failing to adopt, implement and/or enforce Social Media policies that clearly define  
10 what constitutes “SCA Official” and what is not governed by the SCA media office.

11 i. failing to adopt, implement and/or enforce comprehensive policies and procedures for  
12 the office of Diversity, Equity and Inclusion;

13 j. negligently failing to adopt, enforce and/or follow policies and procedures  
14 to protect its members with disabilities, specifically including but not limited to, the “invisible”  
15 disabilities such as Asperger’s or similar ASD, learning disabilities, MS, ADHD, arthritis, brain  
16 injuries, mental illnesses, diabetes, epilepsy, cognitive and learning disabilities, chronic pain etc;

17 k. negligently failing to provide adequate training to SCA officers, both local and  
18 Corporate, in matters of personal relations and proper interactions with members with disabilities,  
19 specifically including but not limited to, the “invisible” disabilities such as Asperger’s or similar  
20 ASD, learning disabilities, MS, ADHD, arthritis, brain injuries, mental illnesses, diabetes,  
21 epilepsy, cognitive and learning disabilities, chronic pain etc;

l. negligently failing to adequately provide a publicly accessible, reasonable, clear  
process for determining who is qualified for Crowns, Peerages or corporate and local offices;

m. negligently failing to adopt a uniform standard of review of Peerage and all officers to  
assure continued adherence to policy and guidelines;



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1 n. negligently violating its own policies and/or by-laws regarding revocation and denial  
2 of membership;

3 o. negligently failing to implement, enforce and/or follow adequate consistent and  
4 published guidelines regarding specific conditions that would result in exile, banishment and/or  
R&D;

5 p. negligently failing to implement, enforce and/or follow adequate consistent and  
6 published guidelines regarding least restrictive sanctions and punishments that fit the  
circumstances of the infraction as per corporate documents;

7 q. negligently violating its own policies and/or by-laws regarding the investigation of  
8 complaints;

9 r. negligently failing to provide adequate training to SCA officers, both local and  
10 Corporate;

11 s. negligently failing to adopt, implement and/or enforce policies and procedures for the  
12 reporting to SCA authorities and/or other authorities harassment, bullying, defamation and  
slander;

13 t. negligently failing to adopt, implement and/or enforce policies and procedures for the  
14 resolution of complaints against other members, specifically, members of peerage or officers;

15 u. negligently failing to adopt, implement and/or enforce policies and procedures for the  
16 resolution of complaints against other members, specifically, members of peerage or officers, that  
includes mediation or other universally accepted measures;

17 47. As a proximate and direct result of Defendant's negligence and/or reckless  
18 conduct described herein, Plaintiffs were harmed as a result and have sustained emotional  
injuries, mental anguish, pain and loss of enjoyment of life and life's pleasures;

19 48. Defendant SCA owes a duty of reasonable care to its members in its activities and  
20 functions. The SCA has, through its history, policies and procedures negligently  
21

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1 and/or recklessly breached this duty. Defendant SCA knew or should have known of the targeted  
2 harassment, to include the retaliation removal of Plaintiff Lori Parker from a kingdom office and  
3 the harassment both suffered at the hands of Raffaella di Contino, Jonnalyhn Wolfcat Prill, Beth  
4 Park, LaToya Johnson, Elizabeth Phipps, Skamp Widegrin (legal name unknown), Michelle  
5 Height (legal name unknown), Angela Gallant, Stephanie McCloud, Rachel Somers, Joel Reid,  
6 Jr.(all assumed legal names) and others unnamed, and the eventual R&D of Plaintiff George  
7 Parker.

8 49. The SCA's acts of negligence and/or recklessness which led to Plaintiff George  
9 Parker's Revocation and Denial of membership occurred from 2016 through 2021. Instead of  
10 taking any reasonable steps and exercising due care to protect Plaintiffs George and Lori Parker  
11 from harassment and abuse, the SCA adopted a "ignore it and it will go away" attitude to  
12 negligently and/or recklessly ignore the known problems as described above.

13 50. The SCA negligently failed to implement, enforce and/or follow protective measures  
14 including enforcing its own policies and procedures against bullying and harassment.

15 51. The SCA negligently failed to implement, enforce and/or follow the published social  
16 media policy wherein it clearly states personal pages are not governed by the SCA.

17 52. The SCA negligently failed to implement, enforce and/or follow protective measures  
18 including enforcing its own policies and procedures for Diversity, Equity and Inclusion.

19 53. Plaintiffs George and Lori Parker bring this action for injunctive relief in that they  
20 were further harmed by the removal and revocation of Plaintiff George Parker's membership,  
21 destroying their medieval business The Norse Gypsy Forge, leaving them with thousands of  
dollars debt, and thousands of dollars of inventory and supplies, through a process that was in  
contravention to the SCA by-laws and policies.

54. As a proximate and direct result of Defendant's negligence and/or reckless conduct  
described herein, Plaintiffs were harmed as a result and have sustained emotional injuries, mental

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1 anguish, pain and loss of enjoyment of life and life's pleasures, loss of business and business  
2 opportunity;

3 55. Defendant SCA knew or should have known about the severe risk of their  
4 failure to take any appropriate precautions outlined above and acted in a reckless disregard to  
5 such risk for which plaintiffs are entitled to and hereby seeks punitive damages pursuant to the  
6 requirements of Washington State law.

7 56. Defendant SCA's actions and failures described herein are outrageous and  
8 were done recklessly with a conscious disregard of the risk of harm to Plaintiffs and their  
9 rights or on other grounds for which plaintiffs were entitled to and hereby seeks punitive  
10 damages in every count of this complaint.

#### 11 COUNT II - NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

12 57. Plaintiff incorporates herein by reference all the allegations contained in  
13 paragraphs 1 through 56 and throughout this entire complaint as though the same were fully set  
14 forth herein at length.

15 58. Defendant had a duty to plaintiff to ensure plaintiffs were not harassed,  
16 defamed, slandered, put in fear of losing their business through the conduct of their officers.

17 59. Defendant by and through its contact with plaintiffs, as described above,  
18 negligently and/or recklessly committed multiple acts of extreme and outrageous conduct which  
19 caused severe emotional distress to both plaintiffs as described more fully above in an extreme,  
20 outrageous and harmful manner.

21 60. Defendant negligently breached the trust to plaintiff leading to their damages and  
injuries.

*Pro Se 2022*COUNT III – INJUNCTIVE RELIEF

61. Plaintiffs incorporates herein by reference all the allegations contained in paragraphs 1 through 60 and throughout this entire complaint as though the same were fully set forth herein at length.

WHEREFORE, Plaintiffs request that the Court order the SCA to reinstate Plaintiff George Parker's membership immediately until the outcome of this proceeding is judged to compensate him for his loss of business, dignity and reputation. Plaintiffs request that Plaintiff Lori Parker be given an extension of her membership to compensate her for her loss of business and enjoyment of her hobby and lifestyle during the time of Plaintiff George Parker's R&D.

62. As described above, the Plaintiffs' enjoyment of their membership in the SCA and their rights as members have been adversely affected by the Defendant's violation of the SCA's by-laws, rules and policies.

63. Plaintiffs were members in good standing for 31 and 29 years respectively, with no sanctions or other corporate actions against them. Plaintiffs were active in volunteering, presenting research, publishing in the Corporation's magazine, teaching classes as well as holding offices. Plaintiffs lost income from their part time business, as it was developed to cater directly to predominantly SCA events and members. This has left the Plaintiffs with inventory and other assets, as well as debt. Plaintiffs have invested thousands of dollars over the last 30 years in the form of membership fees, event registration fees, hotel bills, clothing, accessories, camping equipment, vehicle maintenance, inventory, goods for assembling inventory and other necessary items to present the standard of organizational participation that was expected of all members. Plaintiffs have suffered emotionally from being ripped away from activities and hobbies that had been a major portion of their life and livelihood, as well as from the overt and covert slander from members. Both Plaintiffs suffered sleeplessness, depression, loss of friendships, loss of income, loss of enjoyment and more.

68. Lastly, the benefits to the Plaintiffs in the restoration of Plaintiff George Parker's membership, the restoration of their rights to hold office within the SCA outweigh the burdens to the SCA in allowing the revocation and denial of membership to stand.

- a. Announce the reversal of the Revocation and Denial of participation of Plaintiff George Parker II on all media platforms owned and managed by the corporation.
- b. Issue an apology to Plaintiff George Parker II on all forms of official communication in the organization, including the Facebook groups.
- c. Extend a lifetime membership to Plaintiff George Parker II.

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- d. Extend a lifetime membership to Plaintiff Lori Parker.
- e. Revise or otherwise amend the Corporate documents to clarify and define the actions that will result in a Revocation and Denial of participation.
- f. Revise or otherwise amend the Corporate documents to clarify and define the actions that will result in a Kingdom sanctions above banishment from the presence of the Crown.
- g. Revise or otherwise amend the Corporate documents to clarify and define the least restrictive sanctions and punishments that fit the circumstances of an infraction.
- h. Revise or otherwise amend Corporate documents to clearly state that personal pages are not governed or monitored by the SCA, and that any content on non-SCA pages is not subject to SCA oversight or punishment.
- i. Revise or otherwise amend the Corporate documents to clarify that persona names do not automatically show or otherwise denote SCA participation or membership.
- j. Adopt and implement a clear, concise Diversity, Equity and Inclusion Handbook that includes specific information, training requirements, mediation processes and remedies for those with the so-called invisible disabilities as listed above.
- k. Adopt and implement clear, mandatory Diversity, Equity and Inclusion training for all officers that is tracked for security, and that includes specific information, remedies and processes for those with the so-called invisible disabilities outlined above.
- l. Adopt and implement a concise guide for the election of all officers that is universally applied and available to all members.
- m. Adopt and implement a concise guide for the elevation of members to the Peerage that is universally applied and available to all members.

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- n. Adopt and implement a concise guide for determining who is qualified for Crowns, Peerages and offices (local and national level) that is universally applied and available to all members.
- o. Revise or otherwise amend the Corporate documents to clarify the complaint process at the local and national level.
- p. Revise or otherwise amend the Corporate documents to adequately address member protection from harassment, defamation, slander and bullying at SCA related activities and/or events that are available to all members.
- q. Revise or otherwise amend the corporate documents to clarify local and corporate requirements for the Seneschal office candidates to participate in mandatory conflict resolution training.
- r. Revise or otherwise amend the corporate documents to clarify local and corporate requirements for the Crown or Coronet candidates to participate in mandatory conflict resolution training.
- s. Revise or otherwise amend the Corporate documents to clarify the investigative process at the local and national level.
- t. Revise or otherwise amend the Corporate documents to provide clear policy and procedures for the complaint process to include mediation by 3rd parties unaffiliated in any way with either complainant or defendant, that is universally applied and that is available to all members.
- u. Revise or otherwise amend the Corporate documents to clarify the requirements for the appointment of investigators which includes mandatory training in conflict resolution at the local and national level.
- v. Removal of the requirement in the investigation procedures for video conferencing with an investigator.

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- 1 w. Revise or otherwise amend the Corporate documents to allow for the appeal of  
2 local actions up to and including R&D.
- 3 x. Revise or otherwise amend the Corporate documents to allow for the appeal of  
4 corporate actions up to and including R&D.
- 5 y. Revise or otherwise amend the Corporate documents to allow for the appeal of  
6 local and corporate actions up to and including R&D, that does not include a  
7 requirement for “new information”.
- 8 z. Revise or otherwise amend the Corporate documents to allow for the appeal of  
9 local and corporate actions up to and including R&D, that includes remedies for  
10 officer malfeasance.

#### 11 **IV.CERTIFICATION AND CLOSING**

12 Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my  
13 knowledge, information, and belief that this complaint: (1) is not being presented for an improper  
14 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is  
15 supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing  
16 law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have  
17 evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the  
18 complaint otherwise complies with the requirements of Rule 11.

19 I agree to provide the Clerk's Office with any changes to my address where case-related papers  
20 may be served. I understand that my failure to keep a current address on file with the Clerk's Office may  
21 result in the dismissal of my case.



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1 Date of signing: 1/12/2023

2 Signature of Plaintiff

3 Printed Name of Plaintiff

George DC Parker II



4 Date of signing: 1/12/2023

5 Signature of Plaintiff

6 Printed Name of Plaintiff

Lori A Parker

